

## REMARKS

### I. Introduction

In response to the Office Action dated July 28, 2006, claims [CANCELLED CLAIMS] have been cancelled, claims [AMENDED CLAIMS] have been amended, and [NEW CLAIMS] have been added. Claims [REMAINING CLAIMS] remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

### II. Claim Amendments

Applicants' attorney has made amendments to the claims as indicated above. These amendments were made solely for the purpose of clarifying the language of the claims, and were not required for patentability or to distinguish the claims over the prior art.

### III. Prior Art Rejections

In paragraphs (1)-(2) of the Office Action, claims 1, 6, 8, 13, 15 and 20 were rejected under 35 U.S.C. §102 as being anticipated by Clevenger et al., “[http://www.daz3d.com/program/bryce/Bryce5\\_Manual\\_DAZ.pdf](http://www.daz3d.com/program/bryce/Bryce5_Manual_DAZ.pdf)” (Clevenger). In paragraphs (3)-(4) of the Office Action, claims 2-5, 9-12 and 16-19 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Clevenger and Parametric Technology Corporation et al., [http://www.ptc.com/company/mail/express200202/download\\_guide.htm](http://www.ptc.com/company/mail/express200202/download_guide.htm) (PTC). In paragraph (5) of the Office Action, claims 7, 14 and 21 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Clevenger and SkySof Software “CAD.OCX 1; [http://www.download.com/CAD-OCX/3000-6677\\_4-1400022.html?tag=lst-2-1](http://www.download.com/CAD-OCX/3000-6677_4-1400022.html?tag=lst-2-1)” (SkySof).

Specifically, claims 1, 8 and 15 were rejected as follows:

As to claim 1, Clevenger teaches a method for displaying a graphical illustration of an object in a computer graphics program (PDF page 129, column 1, paragraph 5), Comprising: obtaining an object in a computer graphics program (PDF pg. 129, col. 1, par. 6); displaying a properties palette for the object (PDF pg. 130, Figure 1, col. 1), wherein the properties palette comprises one or more object properties having corresponding property values (PDF pg. 131, col. 1, par. last and col. 2 par. 1-2); displaying a graphical illustration of the object in the properties palette (PDF pg. 130, Figure 1).

As to claim 8, Clevenger teaches an apparatus for displaying a graphical illustration of an object in a computer graphics program of a computer system (PDF pg. 12, col. 1) comprising: (a) a computer having a memory (PDF pg. 12, col. 1 and PDF pg. 126, par. 5); (b) an application executing on the computer (PDF pg. 12, col. 1 and PDF pg. 126, par. 5), wherein the application is configured

to: (i) obtain an object in a computer graphics program (PDF pg. 129, col. 1, par. 6); (ii) display a properties palette for the object (PDF pg. 130, Figure 1, col. 1), wherein the properties palette comprising one or more object properties having corresponding property values (PDF pg. 131, col. 1, par. last and col. 2 par. 1-2); (iii) display a graphical illustration of the object in the properties palette (PDF pg. 130, Figure 1).

As to claim 15, Clevenger teaches an article of manufacture comprising a program storage medium readable by a computer and embodying one or more instructions executable by the computer to perform a method for displaying a graphical illustration of an object in an object-oriented computer graphics system (PDF pg. 12, col. 1), the apparatus comprising: means for obtaining an object in a computer graphics program (PDF pg. 129, col. 1, par. 6); means for displaying a properties palette for the object (PDF pg. 130, Figure 1, col. 1), wherein the properties palette comprises one or more object properties having corresponding property values (PDF pg. 131, col. 1, par. last and col. 2 par. 1-2), means for displaying a graphical illustration of the object in the properties palette (PDF pg. 130, Figure 1).

In addition, dependent claims 2, 9, and 16 are rejected as follows:

As to dependent claim 2, Clevenger teaches of a graphics program that has object properties displayed to the user (PDF pg. 130, Figure 1). Clevenger fails to teach the object properties are keynoted in the palette to refer to corresponding keynotes displayed in the graphical illustration. PTC teaches objects displayed in the illustration are keynoted to refer to the keynotes in a table identifying the objects (PDF pg. 172, Fig. 1). Therefore it would have been obvious to one of ordinary skill in the art at the time of the invention to combine PTC's keynoted objects that refer to the keynoted table into Clevenger's object properties palette. PTC teaches during the drawing stage, the dimensions that show on the plot are derived from the 3D model dimensions, and remain dynamically linked to the source 3d Files (PDF pg. 20, par. last).

Applicant traverses the above rejections for one or more of the following reasons:

- (1) Neither Clevenger nor PTC nor SkySof teach, disclose or suggest the use of keynotes in a properties palette; and
- (2) Neither Clevenger nor PTC nor SkySof teach, disclose or suggest keynoting properties that are displayed in a properties palette.

Independent claims 1, 8 and 15 are generally directed to the use of a properties palette in a computer graphics program. More specifically, a properties palette having object properties and corresponding values for the object are displayed in a properties palette. In addition, a graphical illustration of the object is displayed in the properties palette. Further, the amended claims provide that the properties in the properties palette are keynoted to refer to keynotes displayed in the graphical illustration in the properties palette. Thus, from within the properties palette, you can graphically see which properties correspond to which actual attributes of the displayed object.

The dependent claims further provide for changing various properties and the illustration within the properties will update to reflect the changes. Further, if a property is highlighted in the

graphical illustration (e.g., a keynote is selected), the corresponding object property is highlighted (and vice versa).

The cited references do not teach nor suggest these various elements of Applicants' independent claims.

Clevenger merely describes a tree preview screen that displays a resulting tree object based on changes made in a tree lab. As stated explicitly in Clevenger, the tree preview does not update automatically. Instead, after a series of changes are made, the tree preview must be clicked to update the screen. However, Clevenger lacks any discussion about keynotes and displaying such keynotes in a properties palette.

Prior dependent claims 2, 9, and 16 provided for such keynote capabilities. Such language has been added to the independent claims. The Office Action expressly admitted that Clevenger failed to teach the keynoting as claimed. Instead, the Action relied on PTC for such a teaching. Applicants respectfully traverse such a rejection. PTC merely describes the ability to create a bill of materials consisting of a report table. A bill of materials (or BOM) merely describes a product in terms of its assemblies, sub-assemblies, and basic parts and consists of a list of parts (see [en.wikipedia.org/wiki/Bill\\_of\\_materials](http://en.wikipedia.org/wiki/Bill_of_materials)).

Such a teaching of a BOM is clearly differentiable from the present invention. First, the BOM is not part of a properties palette. A properties palette has a specific meaning as understood in the art and as set forth in the claims and specification. In this regard, the claims provide that the properties palette have object properties and corresponding values. A BOM does not even remotely describe or allude to such a palette. Instead, a BOM is merely a table listing the various components of a product.

The present invention provides distinct advantages by having the ability to have keynoted properties within the properties palette. For example, see paragraphs [0010] and [0011] of the present invention:

**[0010]** Object viewers may be used to provide a preview image or keynoted illustration of an object. In the prior art, such an object viewer is presented in a separate window/dialog from that where the properties may be viewed and edited. Accordingly, the user must undertake multiple actions to actually view a graphical representation of an object and the properties (i.e., multiple windows must be physically opened). Such a requirement and use of multiple actions/tasks is inconvenient and cumbersome.

**[0011]** Accordingly, what is needed is the capability to view an object's properties while simultaneously viewing a graphical representation of the object that may (or may not) be dynamically updated as the properties are changed.

In view of the description of the prior art, the BOM clearly falls within the prior art. Namely, the BOM is not within a properties palette. In this regard, there is not even a remote suggestion to combine the BOM of PTC with the tree view of Clevenger. Further, even if combined, the present invention would not result. Instead, the combination would produce a tree view with a separate BOM (and not keynoted properties within the tree view).

The dependent claims provide further advantages (i.e., with respect to the highlighting of the keynotes and vice versa) that are not even remotely contemplated by either PTC or Clevenger. Nor are such claims result from the combination of PTC with Clevenger.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Clevenger, PTC and SkySof. In addition, Applicants' invention solves problems not recognized by Clevenger, PTC and SkySof.

Thus, Applicants submit that independent claims 1, 8 and 15 are allowable over Clevenger, PTC and SkySof. Further, dependent claims 3-7, 10-14 and 17-21 are submitted to be allowable over Clevenger, PTC and SkySof in the same manner, because they are dependent on independent claims 1, 8 and 15, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 3-7, 10-14 and 17-21 recite additional novel elements not shown by Clevenger, PTC and SkySof.

IV. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

GATES & COOPER LLP  
Attorneys for Applicant(s)

Howard Hughes Center  
6701 Center Drive West, Suite 1050  
Los Angeles, California 90045  
(310) 641-8797

Date: October 30, 2006

By: /Jason S. Feldmar/  
Name: Jason S. Feldmar  
Reg. No.: 39,187

JSF/kmk

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